



Department of Toxic Substances Control



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SSIC NO. 5090.3

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Commanding Officer
Department of the Navy
Naval Facilities Engineering Command
Southwest Division
1220 Pacific Highway
San Diego, CA 92132-5190
Attention: Richard Mach

PRE-FINAL EXPLANATION OF SIGNIFICANT DIFFERENCES (ESD),
PARCEL B, HUNTERS POINT SHIPYARD, SAN FRANCISCO,
CALIFORNIA

Dear Mr. Mach:

California Department of Toxic Substances Control (DTSC) has completed review of the Pre-Final Explanation Significant Differences (ESD). The ESD proposed to make three changes to the previously approved Record Of Decision (ROD) for Parcel B, Hunters Point Shipyard. Our comments are provided as follows:

1. The proposed new remedy for shoreline protection needs more details. The ESD should provide a conceptual design and more specific details as to what type of shoreline protection is proposed.
2. The ESD should delineate the contaminated area where the remedy is proposed to be changed and provide justification for the size of the area needing changes.
3. The ESD should provide measurable performance standards the proposed new remedy is expected to accomplish. A description of how the performance is to be measured and to be compared to the standards should also be provided to avoid future disputes over the compliance with the required protection.
4. Since the contaminants are expected to remain in place under the newly proposed remedy, a contingency plan should be devised in

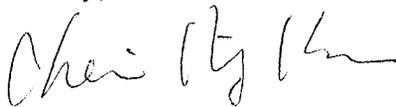
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the case the shoreline protection remedy fails in the future.

5. DTSC recognizes the Navy's on-site treatability study of Soil Vapor Extraction system does show reduction of volatile organic chemicals (VOCs). However, it should be noted that the measured reduction is in the gaseous phase during the study. The cleanup goal for IR-10 is to meet the soil cleanup goals in the ROD. Please clarify if the proposed ESD includes continuous rebound monitoring until soil confirmation samples show VOC concentrations meet soil cleanup goals. As long as the final soil cleanup goals and its confirmation sampling strategy remain unchanged, DTSC has no objection to change the remedy from soil excavation to soil vapor extraction.
6. It also should be noted that while the proposed ESD is to address VOCs in the IR-10 area, co-contaminants, if any, will still need to be addressed after the SVE system completed the cleanup of VOCs.
7. DTSC has no objection in changing the ROD language so that the previously conducted removal actions to be addressed in Parcel B ROD. However, all response actions (interim removal actions and final remedial actions) should meet the same cleanup goals with the same approved Remedial Design confirmation sampling strategy.

If you have any questions, Please contact me at (510) 540-3822.

Sincerely,



Chein Ping Kao, P.E.
Senior Hazardous Substance Engineer
Office of Military Facilities

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